

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 6:20-cv-00423-JFH

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff, United States of America, by authority of the Attorney General of the United States and through its undersigned attorneys, files this motion pursuant to Federal Rule of Civil Procedure 65, and respectfully moves this Court for a preliminary injunction against Jeffrey and Lauren Lowe, Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC (collectively, “Defendants”). The United States requests that the Court enjoin Defendants from placing the health of animals in their care, custody, possession, and control in “serious danger” and from “taking” Endangered Species Act protected Big Cats.¹

Specifically, the United States requests that pending adjudication of the United States’s claims, the Court order: (1) Defendants to provide a complete and accurate inventory of the animals in its care, custody, possession, or control, including name, sex, and age of each animal; and, for the term of the injunction, (2) Defendants not acquire or dispose of any animals without notice to the Court and United States and consent of the Court; (3) Defendants to submit complete and accurate veterinary records to the undersigned attorneys within seven days of any animal being treated by a veterinarian; and (4) authorize United States Department of Agriculture’s (“USDA”) Animal and Plant Health Inspection Services to conduct an immediate

¹ Big Cats include lions, tigers, and hybrids thereof.

inspection of the “Tiger King Park,” and every three weeks for the duration of the injunction, to check on the health and the well-being of the animals. This motion is supported by the accompanying Memorandum In Support of Motion for Preliminary Injunction, and Declarations and Exhibits thereto: Declaration of Brittany Peet; New York Times Article, Justice Department Sues Jeffrey Lowe of ‘Tiger King’ Over Treatment of Animals (Nov. 20, 2020); Declaration of Morris Smith; Declaration of Theodore Melott; Declaration of Kyle Hogan; Declaration of Dr. JoAnne Green; Declaration of Dr. Jennifer Devine; Declaration of IES Investigator McLaughlin regarding Dr. Thomas Gilmore 07/01/20; Declaration of Betty Goldentyer; June 22, 2020 USDA Inspection Report; Declaration of Dr. Laurie Gage; Declaration of Dr. Joyce Thompson; Affidavit of Jeffrey Lowe; Declaration of Dr. Debbie Cunningham; Declaration of Pat Craig; July 8, 2020 USDA Inspection Report; Declaration of Natalie Popovic; Declaration of Taylor Logan; Declaration of Hannah Grace; Declaration of IES Investigator McLaughlin regarding Dr. Thomas Gilmore 09/21/20; Lauren Lowe Statement to Garvin County Sheriff’s Office; August 21, 2020 Inventory Provided by Jeffrey Lowe; June 5, 2019 Inventory page 13 of 22; Suspension Letter; and Amended USDA Administrative Complaint.

Pursuant to LCvR 7.1(f), counsel for the United States conferred with counsel for Defendants on Friday, November 20, 2020 at 5pm CST on the filing of this motion and the relief requested. Counsel for Defendants provided Defendants’ response on Monday, November 23, 2020 at 9:40pm CST. The parties were unable to reach an accord on the issues advanced in the motion for preliminary injunction.

DATED: November 25, 2020

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Respectfully Submitted,

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